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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

**Cung Le, Nathan Quarry, Jon Fitch,  
Brandon Vera, Luis Javier Vazquez, and  
Kyle Kingsbury, on behalf of themselves and  
all others similarly situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**No.: 2:15-cv-01045-RFB-BNW**

**JOINT MOTION TO EXTEND THE  
DEADLINES FOR BRIEFING ON  
DEFENDANT ZUFFA, LLC'S MOTION  
FOR SUMMARY JUDGMENT (ECF  
NO. 878)**

**(First Request)**

Pursuant to Local Rules IA 6-1 and 26-3, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury (“Plaintiffs”) and Defendant Zuffa, LLC (“Zuffa”) (collectively, “the Parties”), by and through their undersigned attorneys, move to extend the deadlines for briefing on Defendant Zuffa, LLC’s (renewed) Motion for Summary Judgment (ECF No. 878) (the “Summary Judgment Motion”). The Parties jointly seek to extend the deadlines the Court set at the status conference on August 21, 2023 (ECF No. 847), as set forth below. This is the first motion for an extension of time for these briefing deadlines relating to Zuffa’s Summary Judgment Motion.

The Parties have met and conferred, reached an agreement, and now jointly move to extend the deadlines for Plaintiffs to file their Opposition to Zuffa’s Summary Judgment Motion and for Zuffa to file its Reply in Support of the Summary Judgment Motion as follows:

Event	Current Deadline	Proposed New Deadline
Plaintiffs to file Opposition to Summary Judgment Motion	November 21, 2023	December 12, 2023
Zuffa to file Reply in Support of Summary Judgment Motion	December 19, 2023	January 31, 2024

As required by Local Rule 26-3, the Parties have good cause to extend these deadlines. Zuffa filed its Summary Judgment Motion on October 24, 2023 (ECF No. 878). The Summary Judgment Motion contains new and revised arguments (and over one hundred supporting exhibits) as compared with Zuffa’s Motion for Summary Judgment filed in 2018 (ECF No. 573). Zuffa also moved to reopen discovery in *Le* (ECF No. 884) on October 24, 2023. Zuffa then filed a motion to treat fact evidence produced in *Johnson v. Zuffa, LLC*, No. 2:21-1189 (D. Nev.) as if it was also produced in this *Le* litigation on October 26, 2023 (ECF No. 885). The briefing schedules for these two discovery motions overlap with the briefing deadlines on Zuffa’s Summary Judgment Motion. Further, an extension applicable only to the deadline for Plaintiffs’ opposition brief would result in the time Zuffa has to prepare and submit its reply brief to fall over the holidays.

The requested extension of the briefing timeline will not affect any other deadlines in this matter.

DATED: October 30, 2023

Respectfully Submitted,

By: /s/ William A. Isaacson  
William A. Isaacson

By: /s/ Eric L. Cramer  
Eric L. Cramer

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*Counsel for the Class and Attorneys for*  
*Individual and Representative Plaintiffs.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of October, 2023 a true and correct copy of **JOINT MOTION TO EXTEND DEADLINES FOR BRIEFING ON DEFENDANT ZUFFA, LLC'S MOTION FOR SUMMARY JUDGMENT (ECF NO. 878)** was served via the District Court of Nevada's ECF system to all counsel of record who have enrolled in this ECF system.

By: /s/ Eric L. Cramer  
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